

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

GENERAL ELECTRIC CAPITAL CORPORATION,)	
)	
)	
Plaintiff,)	Case No. 08 C 1199
)	
v.)	Judge Lefkow
)	
JAMES S. KOENIG, an individual, and)	Magistrate Judge Mason
ASSET REAL ESTATE & INVESTMENT)	
COMPANY, a California corporation,)	
)	
Defendants.)	

**UNOPPOSED MOTION FOR EXTENSION OF TIME
TO RESPOND TO THE COMPLAINT**

Defendants, JAMES S. KOENIG ("Koenig") and ASSET REAL ESTATE & INVESTMENT COMPANY ("Asset"), through their counsel, Michael R. Turoff, Sharilee K. Smentek and Arnstein & Lehr LLP, of counsel, move this Court for an extension of time to respond to the Complaint. In support of their motion, Koenig and Asset state:

1. On February 27, 2008, Plaintiff filed its Complaint against Koenig and Asset. Shortly thereafter, Plaintiff caused Summons to issue to Koenig and Asset.
2. Koenig and Asset were served with Summons and the Complaint on March 3, 2008.
3. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A), Koenig and Asset must serve a response to the Complaint within twenty days after being served or by March 24, 2008.

4. Koenig and Asset's counsel contacted Plaintiff's counsel to request additional time to respond to the Complaint and Plaintiff's counsel agreed to extend the time to respond to, and including, April 16, 2008.

5. Therefore, Koenig and Asset are requesting that the time for responding to the Complaint be extended to, and including, April 16, 2008.

6. Koenig and Asset are filing this motion in good faith and not for the purpose of delay.

WHEREFORE, Defendants, JAMES S. KOENIG and ASSET REAL ESTATE & INVESTMENT COMPANY, request that this Court enter an order extending the time for responding to the Complaint to, and including, April 16, 2008, and for such other relief this Court deems just and equitable.

JAMES S. KOENIG and ASSET REAL
ESTATE & INVESTMENT COMPANY,

By: s/ Sharilee K. Smentek
One of Its Attorneys

Michael R. Turoff (ARDC # 02870258)
Sharilee K. Smentek (ARDC # 6277773)
ARNSTEIN & LEHR LLP
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CERTIFICATE OF SERVICE

Sharilee K. Smentek, an attorney, certifies that she served the foregoing Unopposed Motion for Extension of Time to Respond to the Complaint on the party listed below on March 19, 2008:

Timothy J. Rivelli
WINSTON & STRAWN LLP
35 W. Wacker Drive
Chicago, IL 60601

via email notification served by the CM/ECF system.

s/ Sharilee K. Smentek